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Karamvir Dahiya, Esq.
Proposed Counsel for the Debtor

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X Case No. 14-13455
IN RE:

HEPHAISTOS BUILDING SUPPLIES, INC.

IN PROCEEDING FOR
FOR REORGANIZATION UNDER
CHAPTER 11

DEBTOR.

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REGARDING MATRIMONIAL DISCOVERY VIS-À-VIS THE DEBTOR

The Debtor through its proposed counsel Karamvir Dahiya of Dahiya Law Offices LLC respectfully submit the following:

1. The undersigned is the counsel for the debtor and Michael Karantinidis is the principal of the debtor.
2. Mr. Karantinidis is a defendant in the divorce proceeding pending with the Supreme Court, Queens County, New York.
3. The Court on January 15, 2015 opined and reasoned regarding the discovery related to Mr. Karantinidis divorce proceeding.
4. Debtor, Hephaistos Building Supplies, Inc. is an independent entity and a third party in the divorce proceeding.
5. I as a proposed counsel for the debtor is not averse to discovery as far as it relates to the matrimonial aspect of the State Court action. And after the hearing that concluded on January 15, 2015, I made it clear to the counsel and his team for the Ms. Vaia Delimiditropolu, the plaintiff of State Action that the discovery related to the debtor must be addressed to the undersigned. I as a counsel for the debtor have to maintain the procedural safeguards and protect the interest of the debtor and its creditors.
6. Once the undersigned is served with the proper discovery, as a third party in the divorce proceeding, we will comply with them without prejudice to our rights. It is also clear that the assets of the debtor are not marital assets, it is the stockownership that which could be characterized as a marital asset. And we will work and coordinate with the State counsels regarding the same.
7. I have not been provided any request for discovery regarding the debtor. However as a matter of good faith effort, I inform the Court and the parties that some information might be gleaned and copied easily from some

computers, however Point of Sale (POS) software is more than 20 year old and is custom made.

8. The undersigned still await for the service of proper discovery demands, as a third party to expedite the process. Keeping in mind the procedural safeguards, proprietary information and trade secrets etc., we will comply within the bounds of law.

Wherefore, the debtor submits the above statement as true statement based on the information obtained from Mr. Karaninidis regarding the debtor.

Dated: January 16, 2015

/s/karamvir dahiya

Karamvir Dahiya for the debtor